

EXHIBIT A

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**From:** Larkin, Arthur (Law) <alarkin@law.nyc.gov>  
**Sent:** Wednesday, March 26, 2014 9:47 AM  
**To:** Friedberg, Anna; Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law)  
**Subject:** RE: Nunez - E-Dsc

Once again, Anna, we appreciate the need for communication, as well as your side's diligence in following up, and we'll provide the information you need as soon as we reasonably can.

Arthur G. Larkin, Esq.  
Senior Counsel  
NYC Law Department  
100 Church St., Room 3-177  
New York, New York 10007  
(212) 356-2641 (tel.)  
(212) 788-9776 (fax)

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**From:** Friedberg, Anna [mailto:Anna.Friedberg@ropesgray.com]  
**Sent:** Wednesday, March 26, 2014 9:41 AM  
**To:** Larkin, Arthur (Law); Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law)  
**Subject:** Re: Nunez - E-Dsc

We understand your team is busy so if it is easier than scheduling a call, below is the information we were hoping to obtain on the call. Please provide the following information by Friday, March 28th:

- Number of Venters emails left to be produced (if any)
- Number of Masters emails left to be produced
- Number of emails from Cathy Potler, Richard Wolfe, Felix Martinez
- Current average rate of review in light of the additional reviewers brought on about 3 weeks ago. Plaintiffs are concerned about the rate of review as the City has produced approximately 2,500 pages of ESI since January 16th and understand that there are still 300,000 responsive emails and attachments left to be reviewed for production.

When can we expect the next production?

Thanks,  
Anna

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**From:** Larkin, Arthur (Law) [mailto:[alarkin@law.nyc.gov](mailto:alarkin@law.nyc.gov)]  
**Sent:** Tuesday, March 25, 2014 07:10 PM  
**To:** Friedberg, Anna; Joyce, Kimberly (Law) <[kjoyce@law.nyc.gov](mailto:kjoyce@law.nyc.gov)>; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law) <[lysnyder@law.nyc.gov](mailto:lysnyder@law.nyc.gov)>; Lim, Daniel (Law) <[dlim@law.nyc.gov](mailto:dlim@law.nyc.gov)>  
**Subject:** Re: Nunez - E-Dsc

We won't be available for any calls tomorrow or Thursday, but we will make every effort to get you the information you've requested, as soon as possible.

Arthur Larkin  
212-356-2641

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**From:** Friedberg, Anna [mailto:[Anna.Friedberg@ropesgray.com](mailto:Anna.Friedberg@ropesgray.com)]  
**Sent:** Tuesday, March 25, 2014 07:02 PM  
**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie <[Stephanie.Busalacchi@ropesgray.com](mailto:Stephanie.Busalacchi@ropesgray.com)>; Cobb, Emily A. <[Emily.Cobb@ropesgray.com](mailto:Emily.Cobb@ropesgray.com)>  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Larkin, Arthur (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Kim,

We still have not received a response regarding your availability for a call tomorrow. If you are unavailable, can you please provide the requested information by email tomorrow?

Thanks,  
Anna

**Anna E. Friedberg**  
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**From:** Friedberg, Anna  
**Sent:** Monday, March 24, 2014 7:45 AM  
**To:** [kjoyce@law.nyc.gov](mailto:kjoyce@law.nyc.gov); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** [lysnyder@law.nyc.gov](mailto:lysnyder@law.nyc.gov); [dlim@law.nyc.gov](mailto:dlim@law.nyc.gov); [alarkin@law.nyc.gov](mailto:alarkin@law.nyc.gov)  
**Subject:** Re: Nunez - E-Dsc

Hi Kim,

I hope you had a nice weekend. We would like to set up a check-in call on Wednesday to discuss the pace of review, 502 (d) Order, privilege log. In anticipation of the call we were hoping you could provide us the following information:

- Number of Venters emails left to be produced (if any)
- Number of Masters emails left to be produced
- Number of emails from Cathy Potler, Richard Wolfe, Felix Martinez

Are you and your team available at 3 or 3:30 on Wednesday?

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Friday, March 21, 2014 03:54 PM  
**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law) <[lysnyder@law.nyc.gov](mailto:lysnyder@law.nyc.gov)>; Lim, Daniel (Law) <[dlim@law.nyc.gov](mailto:dlim@law.nyc.gov)>; Larkin, Arthur (Law) <[alarkin@law.nyc.gov](mailto:alarkin@law.nyc.gov)>  
**Subject:** RE: Nunez - E-Dsc

Anna,

Attached is the cover letter for the production which is going out today.

Please let me know if you have any questions.

Thanks.

-Kim

**Kimberly (Savino) Joyce**  
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(212) 788-9776 (fax)

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]  
**Sent:** Tuesday, March 18, 2014 8:15 PM  
**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Larkin, Arthur (Law)  
**Subject:** RE: Nunez - E-Dsc

Thanks, Kim.

Arthur mentioned that emails from additional custodians Amanda Masters, Cathy Potler, Richard Wolfe, Felix Martinez are also to be produced. What is the universe of responsive documents for these custodians? Please advise as soon as possible. The emails for these custodians should be prioritized with the production of Bailey, Duffy, Agro and Mulvey.

Following the production of the individuals above please prioritize the production as outlined below:

- Berliner
- Benitez
- Cussen
- Gooding
- Blaskovic
- Cranston
- Finkleman

When can we expect the next production? You mentioned to me on Friday that you were expecting to produce yesterday. I did not receive a production yesterday or today. I will be in the office tomorrow afternoon if you would like to discuss.

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Tuesday, March 18, 2014 7:37 PM  
**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Larkin, Arthur (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Anna,

Could you please prioritize the custodians you'd like reviewed after Bailey/Duffy/Agro/Mulvey? I believe the remaining Phase II custodians are Benitez, Cussen, Gooding, Berliner, Suprenant, Blaskovic, Cranston, and Finkleman. If you don't have a preference I'd suggest we complete Berliner, then move on to Suprenant, and Blaskovic.

I'm out of the office Wednesday & Thursday at depositions, so please reply all to this email so Lynda can arrange the Clearwell review accordingly.

Thanks.

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]  
**Sent:** Thursday, March 13, 2014 6:15 PM  
**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Larkin, Arthur (Law)  
**Subject:** Re: Nunez - E-Dsc

Thanks, Kim.

I will come by tomorrow morning and get the CD from you.

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Thursday, March 13, 2014 06:07 PM  
**To:** Busalacchi, Stephanie; Friedberg, Anna; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law) <[lysnyder@law.nyc.gov](mailto:lysnyder@law.nyc.gov)>; Lim, Daniel (Law) <[dlim@law.nyc.gov](mailto:dlim@law.nyc.gov)>; Larkin, Arthur (Law) <[alarkin@law.nyc.gov](mailto:alarkin@law.nyc.gov)>  
**Subject:** RE: Nunez - E-Dsc

Anna & Stephanie,

Attached is the cover letter for the production you will be receiving tomorrow. I figured since I'd be there for the Massey deposition at 10 am that I would just bring the production with me. You will be receiving an additional production either tomorrow afternoon or Monday, depending on how long the deposition takes.

Thank you.

-Kim

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**From:** Busalacchi, Stephanie [<mailto:Stephanie.Busalacchi@ropesgray.com>]  
**Sent:** Wednesday, March 12, 2014 5:52 PM  
**To:** Joyce, Kimberly (Law); Friedberg, Anna; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law); Larkin, Arthur (Law)  
**Subject:** RE: Nunez - E-Dsc

Thank you for the update, Kim.

Please find attached a revised draft of the 502(d) order, with a redline against what you sent. Please let us know if you would like to discuss any of the changes we have made. We mainly tried to make the obligations of each party as clear as we could. We also added a signature block for conflicts counsel and think we should ask them to sign onto this Order once we have agreed to the form.

Thanks,  
Stephanie

**Stephanie N. Busalacchi**  
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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Wednesday, March 12, 2014 5:18 PM  
**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law);

Larkin, Arthur (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Anna,

I will wait for your response regarding the proposed 502(d) order. In regards to your below email, the figure 1,206 were emails left to be reviewed, not emails remaining to be produced.

As to the areas in which you wanted an update, please see below:

- Venters/Berliner emails: You will be receiving a production this Friday that includes Venters' emails from the Berliner custodian file, as well as some additional emails that don't relate to Dr. Venters;
- Venters/other custodian emails: There are approximately 670 emails left to be reviewed that involve Venters and other custodians - we will produce these materials in the next production, not this Friday.
- Privilege log/categories: at this time we are still in the process of refining the privilege log categories. We are using generally Law Enforcement privilege, deliberative process/policy privilege, attorney-client communication, and attorney work product. As I'm sure you can imagine, the analysis of the privileges will change as we move up the food chain, so to speak, with custodians -from lower level uniformed officers to civilian management staff - i.e. the categories will be different if it is the Commissioner talking to someone in the General Counsel's office vs. someone in the General Counsel's office investigating a tort. When we are in a position to share the refined categories, we will do so.
- Reproduction/claw back documents: you will be receiving a reproduction this Friday, with certain documents identified as needing to be clawed back.
- Daily rate of review: As I indicated on our last call, we are not in a position to give you a 3rd/4th day rate of review. We've been concentrating on training the new staff, and less on the rate of review. We had a group training most of the day last Thursday, and spent a significant amount of time Tuesday with additional group re-training. As I'm sure you are aware, there is a learning curve in this type of review. As the reviewers get more comfortable with the subject matter the pace should increase. When we are able to provide a reliable daily rate of review we will do so, but it will not be within the next week or two.

Thank you.

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Wednesday, March 12, 2014 12:24 PM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law); Larkin, Arthur (Law)

**Subject:** RE: Nunez - E-Dsc

All,

As we discussed, we look forward to an update on the document review today. We are also hoping to arrange for a production of the outstanding Venters emails. We understand that as of February 25<sup>th</sup> about 1,206 emails remain to be produced (206 from the Berliner custodian file and 1,000 from the other custodian files). Can the production of these emails be made by Monday, March 17<sup>th</sup>?

We will follow-up separately on the proposed 502(d) order.

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Thursday, March 06, 2014 3:45 PM

**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law); Larkin, Arthur (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Anna,

Here are the totals for Sara Taylor and Brian Suprenant:

Suprenant – 12,840

Taylor - 20,556

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Thursday, March 06, 2014 12:27 PM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law); Larkin, Arthur (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

Thanks again for sending the chart below. We noticed that the list below didn't include Sarah Taylor or Brian Suprenant, two of the Group C custodians. Is production complete for those two custodians? If not, how many emails remain for these individuals.

Thanks,

Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Wednesday, March 05, 2014 4:39 PM

**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law); Larkin, Arthur (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Anna,

Below please find the list of custodians and emails left to be reviewed - as discussed on the call, the numbers will fluctuate depending on the order in which you prioritize the custodians.

Custodian	Parent emails (non-unique)
Agro-Doyle, Rose	16,445
Bailey, Emmanuel	130
Benitez, Ruben	11,912
Berliner, Erik	241
Blaskovic, Sabina	4,102
Cranston, Mark	4,098
Cripps, Robert	22,452
Cussen, Sean	38,541
Davis, Joandrea	24,179
Davis; Sr., Larry	15,445
Duffy, Edmond	6,940
Finkle, Florence	9,883
Finkleman, Lewis	19,473
Gooding, Janet	4,809
Hourihane, Michael	5,867
Jorgensen, Ronald	1,248
LaBruzzo, Carmine	12,044
McLaughlin, Gregory	18,198
Mirabal, Evelyn	23,315
Mulvey, Kathleen	9,633
Newton, Carlton	12,560
Schriro, Dora	8,407
Scott, Mark	22,354

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Tuesday, March 04, 2014 3:01 PM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

We look forward to touching base tomorrow. One technical request, could the productions going forward always include the text and native paths in the dat. file? Outlined below are the items we were hoping to discuss on the call.



- *Production Priority*
  - As we discussed, please prioritize the production of the Venters emails within Berliner and other custodians followed by the production of emails for the Bailey, Mulvey/Duffy and finally Agro-Doyle custodians. We understand that some of the review and production for these custodians can occur simultaneously. As we discussed, we are hoping that you can make weekly productions for these custodians. We can discuss the feasibility of this on our next call.
- *Privilege Issues*
  - We also wanted to follow-up on the privilege issues we previously discussed. When can Plaintiffs expect a replacement production for the production we returned on February 7<sup>th</sup>? We also remain willing to sign a 502 D order and to discuss the City's proposed categories for the privilege log as we outlined in our January 23<sup>rd</sup> email.
- *Review Rates*
  - We understand you are onboarding additional team members early next week. We were hoping you could provide average review rates from the third and fourth days of the review. It is our experience that review rates from these days serve as a good barometer for review rates going forward.
- *Outstanding Production*
  - We were hoping you could identify which Group C custodians still have outstanding electronic discovery (with the exception of the already identified individuals). We were also hoping you could provide an estimate of the approximate number of documents outstanding for each of those individuals.

Thanks!

Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Friday, February 28, 2014 4:18 PM

**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Anna, I will be delivering the production this afternoon. Could someone please add me to the visitor list - I apologize for the short notice.

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Friday, February 28, 2014 8:32 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

Thanks again for the update. We had a couple of follow-up questions and items we wanted to confirm.

- *Follow-up Question*

- Could you confirm whether the numbers below are unique emails for each individual? We assume so but please let us know if we are mistaken.
- *Production*
  - I did not receive a production of the Berliner/Venters emails yesterday. When can we expect that?
- *Production Priority*
  - As we discussed, please prioritize the production of the Venters emails within Berliner and other custodians followed by the production of emails for the Bailey, Mulvey/Duffy and finally Agro-Doyle custodians. We understand that some of the review and production for these custodians can occur simultaneously. As we discussed, we are hoping that you can make weekly productions for these custodians. We can discuss the feasibility of this on our next call.
- *Privilege Issues*
  - We also wanted to follow-up on the privilege issues we previously discussed. When can Plaintiffs expect a replacement production for the production we returned on February 7<sup>th</sup>? We also remain willing to sign a 502 D order and to discuss the City's proposed categories for the privilege log as we outlined in our January 23<sup>rd</sup> email.
- *Review Rates*
  - We understand you are onboarding additional team members early next week. We were hoping you could provide average review rates from the third and fourth days of the review. It is our experience that review rates from these days serve as a good barometer for review rates going forward.

I will circulate a dial-in for a call next Wednesday at 3:30 p.m. as we discussed.

Thanks,  
Anna

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---

**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Tuesday, February 25, 2014 9:57 PM  
**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Anna,

Below please find the below answers to your questions:

- We are preparing a production of Erik Berliner emails, approximately 420;
  - Production of Berliner emails to date: (60)
  - The number of Venters emails left to be produced from:
    - Berliner Custodian Emails: (206)
    - Other Custodian Emails: (1000)
  - The number of emails left to be produced for:
    - Emmanuel Bailey: (122)
    - Rose Agro-Doyle: (16,445)

- o Edmund Duffy: (6,453)
- o Kathleen Mulvey: (6,467)

-Kim

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Monday, February 24, 2014 9:15 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

I hope you had a nice weekend. We are hoping to schedule a call Wednesday afternoon to discuss the production items listed below. We are available at 3:30. Would that work for you guys?

As we discussed, we would like to prioritize the production of the DOC custodian emails with Homer Venters followed by the production of the 4 supervisors listed below. On the call on Wednesday we are hoping you could provide us with an update on the following:

- Production of Berliner emails to date
- The number of Venters emails left to be produced from:
  - o Berliner Custodian Emails
  - o Other Custodian Emails
- The number of emails left to be produced for:
  - o Emmanuel Bailey
  - o Rose Agro-Doyle
  - o Edmund Duffy
  - o Kathleen Mulvey

Thanks,  
Anna

**Anna E. Friedberg**  
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---

**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Thursday, February 20, 2014 2:06 PM

**To:** Friedberg, Anna; Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Anna,

We're available to speak tomorrow between 11 and 12. Please circulate a dial-in.

On another note, I received your voice message re: the transcripts. Sorry for not calling back - could we discuss that at the end of tomorrow's call?

Thanks.

-Kim

**Kimberly (Savino) Joyce**

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**From:** Friedberg, Anna [<mailto:Anna.Friedberg@ropesgray.com>]

**Sent:** Thursday, February 20, 2014 11:12 AM

**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Hi Kim,

We would like to set up a call to discuss the priority of production of electronic discovery in light of the Court's order yesterday. Are you available this afternoon any time between 3 and 5 or tomorrow between 11 and 12 or 2 and 4?

Thanks,  
Anna

**Anna E. Friedberg**

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]

**Sent:** Monday, February 10, 2014 3:46 PM

**To:** Busalacchi, Stephanie; Friedberg, Anna; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)

**Subject:** RE: Nunez - E-Dsc

Great, thanks. Talk to you all then.

-Kim

**Kimberly (Savino) Joyce**

Senior Counsel  
New York City Law Department  
Special Federal Litigation  
100 Church Street, 3-227  
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**From:** Busalacchi, Stephanie [<mailto:Stephanie.Busalacchi@ropesgray.com>]

**Sent:** Monday, February 10, 2014 3:41 PM

**To:** Joyce, Kimberly (Law); Friedberg, Anna; Cobb, Emily A.

**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Thanks, Kim. Let's do 1pm on Wednesday. We can use the dial in below:

(888) 352- 5988  
Code: 2125969163

**Stephanie N. Busalacchi**  
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[Stephanie.Busalacchi@ropesgray.com](mailto:Stephanie.Busalacchi@ropesgray.com)  
[www.ropesgray.com](http://www.ropesgray.com)

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Monday, February 10, 2014 12:54 PM  
**To:** Busalacchi, Stephanie; Friedberg, Anna; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Stephanie,

We are available between 12 and 2 on Wednesday. If that time range works for your side please circulate a dial-in #.

Thank you.

-Kim

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**From:** Busalacchi, Stephanie [<mailto:Stephanie.Busalacchi@ropesgray.com>]  
**Sent:** Monday, February 10, 2014 11:24 AM  
**To:** Friedberg, Anna; Joyce, Kimberly (Law); Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Kim,

As Anna mentioned, we'd like to set up a call this week. Is your office available on Wednesday? Anytime between 11am-4pm would work for us.

Thanks,  
Stephanie

**Stephanie N. Busalacchi**  
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**From:** Friedberg, Anna  
**Sent:** Monday, February 10, 2014 9:00 AM  
**To:** Joyce, Kimberly (Law); Busalacchi, Stephanie; Cobb, Emily A.  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** RE: Nunez - E-Dsc

Hi Kim,

I hope you had a nice weekend. We returned the CD production with the inadvertent production on Friday (see attached letter). Please re-produce a revised production as soon as possible.

Stephanie will be in touch to set up a call today. As I mentioned we would like to discuss when we can expect the production of the Berliner emails. We would also like to discuss prioritizing the production of Danielle Johnson's emails so we have all of these materials 30 days in advance of her deposition that has been noticed for April 1, 2013.

We understand you would also like to discuss a privilege protocol on this call and we are available to discuss.

Thanks,  
Anna

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**From:** Joyce, Kimberly (Law) [<mailto:kjoyce@law.nyc.gov>]  
**Sent:** Wednesday, February 05, 2014 4:33 PM  
**To:** Friedberg, Anna  
**Cc:** Snyder, Lynda (Law); Lim, Daniel (Law); Grygiel, Heidi (Law); Oliver, Vincent (Law); Darigan, Stephanie (Law)  
**Subject:** Nunez - E-Dsc

Hi Anna,

Is your side available for a brief call either Friday before 2pm, or Monday? We'd like to discuss the claw back of the one email we've already discussed, and talk about setting up a similar process going forward.

Thanks.

-Kim

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